

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.* : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
: :  
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**AFFIDAVIT AND DISCLOSURE STATEMENT OF KENNETH J. FRIEDMAN,  
ON BEHALF OF PAUL, HASTINGS, JANOFSKY & WALKER LLP**

STATE OF NEW YORK )  
 ) ss:  
COUNTY OF NEW YORK )

Kenneth J. Friedman, being duly sworn, upon his oath, deposes and says:

1. I am a partner in the law firm of Paul, Hastings, Janofsky & Walker LLP with offices in several locations, including an office located at Park Avenue Tower, 75 East 55th Street, 1st Floor, New York, New York 10022 (the “Firm”).
2. Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the “Debtors”) and, collectively with their non-debtor affiliates, “Lehman”), have requested that the Firm provide certain real estate services to the Debtors. More specifically, the Debtors have asked that the Firm represent the Debtors and their direct and indirect subsidiaries in (a) asset management and liquidation activities with respect to loans and other assets, and (b) the negotiation of commercial real estate lease transactions, such as subleases, assignments, and

amendments to existing leases. The Firm has consented to provide such services and other legal services as the Debtors may request.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not have any relationship with any such person, their attorneys, or accountants that would be adverse to the Debtors or their estates in the matters for which the Firm seeks to be employed.

4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and employees of the Firm.

5. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

**The Firm's Disclosure Procedures**

6. The Firm may have in the past represented, may currently represent, and likely in the future will represent parties-in-interest in these chapter 11 cases. The Firm has a large and diversified legal practice that encompasses the representation of many financial institutions and commercial corporations.

7. The Firm received from the Debtors' counsel a list of parties-in-interest (collectively, the "Interested Parties"). The list may have changed without our knowledge and may change during the pendency of the chapter 11 cases.

8. The Firm searched on its electronic database for its connection to the Interested Parties. Based on the conflicts search conducted to date and described herein, to the best of my knowledge, neither I, the Firm, nor any partner or associate thereof, insofar as I have been able to ascertain, has any "connection" with the Debtors, their creditors, or any other Interested Parties, their respective attorneys and accountants, the U.S. Trustee, or any person employed in the office of the U.S. Trustee, except as disclosed or otherwise described herein and in the exhibit hereto.

9. Neither the term "connection," as used in Fed. R. Bankr. P. 2014, nor the proper scope of a professional's search for "connection" has been defined, and I am therefore uncertain what this Court may consider a "connection" requiring disclosure. Out of an abundance of caution, I am disclosing many representations, which are not, to my understanding, disqualifying or problematic under either Section 327(e) of the Bankruptcy Code or applicable standards of professional ethics.

#### **Specific Disclosures**

10. Based on its conflicts research, the Firm makes the following specific disclosures:

- a. Annexed hereto as Exhibit 1 is a list of Interested Parties (or their affiliates) whom the Firm represents, or has represented in the past, in matters unrelated to the matters on which the Firm seeks to be employed.

- b. For prepetition legal services rendered and expenses incurred, the Debtors owe the Firm approximately \$840,000 as of the Petition Date.<sup>1</sup> The Firm intends to retain this claim against the Debtors and their estates.
- c. The Firm regularly represents, or has represented in the past, certain non-debtor affiliates of the Debtors. As of the Petition Date, these non-debtor affiliates<sup>2</sup> owed the Firm approximately \$1 million for legal services rendered and expenses incurred.
- d. The Firm represents certain entities in matters adverse to one or more of the Debtors in matters unrelated to the matters on which the Firm seeks to be employed. These entities include:<sup>3</sup>

Hokuriku Labour Bank  
Credit Centerline Affordable Housing Advisors LLC  
Metropolitan West Asset Management, LLC  
Rimrock Capital Management LLC  
New Mexico State Investment Office  
The Procter & Gamble Company  
Asia Pacific Capital Company  
Iberdrola Renewables, Inc.  
WalMart Japan  
Samsung Securities Co., Ltd.  
Tiffany & Co.  
Equity Office Properties Trust  
Acadia Realty Trust  
Resource America, Inc.  
Grubb & Ellis Company  
APL China Development  
AIG Capital Recovery Group  
Walton Street Capital, LLC  
NorthStar Realty Finance Corp.  
Banca Popolare di Vicenza S.c.r.l.  
Joss Realty Partners LLC  
NorthWestern Corporation  
CT Mezzanine Partners III, Inc.

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<sup>1</sup> As of the Petition Date, Lehman Brothers Inc. owed the Firm approximately \$644,000 for legal services rendered and expenses incurred.

<sup>2</sup> The non-debtor affiliates include both U.S. and non-U.S. entities, including Lehman affiliates that may be in bankruptcy or insolvency-related proceedings outside the United States.

<sup>3</sup> An additional entity has retained the Firm on a confidential basis. To my knowledge, the matter is unrelated to the matters on which the Firm seeks to be employed.

Digital Realty Trust  
L&L Holding Company LLC  
Rockwood Capital, LLC  
Savanna Fund  
Goldenbridge Advisors, LLC  
SK Energy  
Morgan Stanley Real Estate Fund V – Domestic L.P.  
FairPoint Communications, Inc.  
Capital Trust, Inc.  
Perella Weinberg Partners LP  
Six Flags, Inc.  
Ford Motor Company  
GE Capital Corporation  
GE Corporate Finance Bank SAS  
GECF/Bankruptcy National  
605 Third Avenue Fee LLC

e. The Firm represents certain entities in matters adverse to one or more non-debtor affiliates<sup>4</sup> of the Debtors in matters unrelated to the matters on which the Firm seeks to be employed. These entities include:

K.K. daVinci Advisors  
Asia Pacific Land (Japan) Ltd.  
Marathon Asset Management  
Beacon Capital Partners (London) Limited  
The Corporate Presence  
605 Third Avenue Fee LLC

f. In the past, the Firm has represented certain entities in matters adverse to certain Debtors and/or their non-debtor affiliates. To my knowledge, other than as disclosed in subparagraphs d and e above, the matters are closed.

g. Neuberger Berman LLC (“Neuberger”) is a non-debtor indirect subsidiary of LBHI. Neuberger is a tenant of certain real property held by 605 Third Avenue Fee LLC, a Fisher Brothers entity. In connection with a possible sale of stock or assets of Neuberger, LBHI may seek to transfer its real property lease to the purchaser or LBHI may seek to separate the lease from the shares. The Firm represents 605 Third Avenue Fee LLC and has filed an objection in connection with that proceeding. To my knowledge, this matter is unrelated to the matters on which the Firm seeks to be employed.

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<sup>4</sup> The non-debtor affiliates include both U.S. and non-U.S. entities, including Lehman affiliates that may be in bankruptcy or insolvency-related proceedings outside the United States.

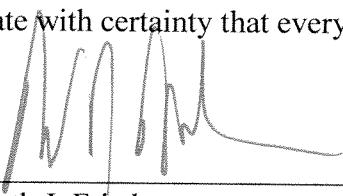
- h. From time to time, the Firm has referred work to other professionals retained or to be retained in these chapter 11 cases. Likewise, certain such professionals have referred work to the Firm. In matters unrelated to the matters on which the Firm is to be employed, the Firm has worked with certain of the Debtors' other professionals.
- i. Certain insurance companies pay the legal bills of the Firm clients. Some of these insurance companies may be involved in these chapter 11 cases. None of these insurance companies, however, are Firm clients as a result of this situation.
- j. Given the number of attorneys in its offices, several attorneys at the Firm have professional, working, or social relationships with firms or professionals at firms that may be adverse to the Debtors. In addition, several attorneys at the Firm have spouses, parents, children, siblings, fiancés or fiancées who are attorneys at other law firms or companies. Also, certain attorneys at the Firm may have spouses, parents, children, siblings, fiancés or fiancées who are employees of one or more of the Debtors. The Firm has strict policies against disclosing confidential information to anyone outside of the Firm, including spouses, parents, children, siblings, fiancés and fiancées.
- k. The Firm has several hundred attorneys and other employees. It is possible that certain Firm attorneys or employees hold interests in mutual funds or other investment vehicles that may own the Debtors' securities.

11. I am not related to and, to the best of my knowledge, no other attorney at the Firm is related to: (a) any United States Bankruptcy Judge for the Southern District of New York, or any of the District Judges for the Southern District of New York who handle bankruptcy cases, or (b) the United States Trustee for the Southern District of New York or any person employed by the Office of such United States Trustee.

12. Based on the foregoing and except as provided herein and in the exhibit hereto, to the best of my knowledge, information, and belief formed after reasonable inquiry, the Firm does not: (a) represent or hold any interest adverse to the Debtors or their estates with respect to the matters on which the Firm seeks to be employed; or (b) have any connection with the Debtors, any creditors or other Interested Parties, their respective attorneys and accountants,

or the United States Trustee for the Southern District of New York or any person employed by the Office of such United States Trustee.

13. Despite the efforts described above to identify and disclose the Firm's connections with the Interested Parties in these cases, because the Firm is an international firm with hundreds of attorneys in several offices, and because the Debtors have hundreds of creditors and other relationships, the Firm is unable to state with certainty that every client representation or other connection has been disclosed.



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Kenneth J. Friedman

SWORN AND SUBSCRIBED before me  
this 20 day of December, 2008.



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Lauren P. Schmauch

Notary Public

My Commission Expires:

**LAUREN P. SCHMAUCH  
NOTARY PUBLIC, State of New York  
No. 01SC5031836  
Qualified in Queens County  
Commission Expires 08/15/2010**

**Exhibit 1**

**Interested Parties or Their Affiliates Whom the Firm Represents  
or Has Represented in the Past in Matters Unrelated to the  
Matters on Which the Firm Seeks to Be Employed<sup>5</sup>**

**50 Largest Bondholders**

PIMCO Advisors LP – affiliated with Allianz SE  
Barclays Global Fund Advisors – affiliated with Barclays PLC UK  
Vanguard Group Incorporated  
UBS Investment KAG – affiliated with UBS AG  
Franklin Advisors Inc. – affiliated with Franklin Resources Inc.  
American Life Insurance Company – affiliated with AIG  
Capital Research and Management – affiliated with Capital Group Companies  
Fidelity Management and Research – affiliated with FMR Corp.  
Metropolitan Life Insurance Company – affiliated with Metlife Inc.  
Federated Investors  
Loomis Sayles & Company L.P. – affiliated with Natixis  
Sun Life Assure Co. of Canada  
Teachers Insurance and Annuity Association  
Northwest Mutual Life Insurance Company  
AXA Equitable Life Insurance Company – affiliated with AXA Group  
BBVA Gestión SA SGIIC (Spain) – affiliated with Banco Bilbao Vizcaya Argentaria SA  
Allianz Life Insurance Company of North America – affiliated with Allianz SE  
Prudential Insurance Company of America – Prudential Financial Inc.  
Van Kampen Asset Management – affiliated with Morgan Stanley  
Zurich American Insurance Company – affiliated with Zurich Financial Services  
AIG Annuity Insurance Company – affiliated with AIG  
Jackson National Life Insurance – affiliated with Prudential Plc  
John Hancock Life Insurance Company – affiliated with Manulife Financial Corp.  
Hartford Life Insurance Company – affiliated with Hartford Financial Services  
PIMCO Funds Global Investors – affiliated with Allianz SE  
AETNA Life Insurance Company – affiliated with Aetna Inc.  
NATIXIS Asset Management Advisors – affiliated with Natixis  
Guardian Life Insurance Company  
T. Rowe Price Associates  
Principal Life Insurance Company – affiliated with Principal Financial Group  
Western Asset Management Company – affiliated with Legg Mason Inc.

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<sup>5</sup> This list may include Debtors whom Paul Hastings may represent in the chapter 11 cases in matters on which the Firm seeks to be employed.

Continental Casualty Company – affiliated with Loews Corp.  
John Hancock Investment Management Services – affiliated with Manulife Financial Corp.  
Franklin Templeton Investments – affiliated with Franklin Resources Inc.  
Thrivent Financial for Lutherans  
Metlife Insurance Company of Connecticut – affiliated with Metlife Inc.  
Transamerica Life Insurance Company – affiliated with AEGON NV  
Metropolitan West Capital Management – affiliated with Wachovia Corp.  
ING Investment LLC – affiliated with ING Group NV  
Prudential Financial Inc.  
American Family Life Assurance Company

100 Largest Unsecured Creditors other than Bondholders

Citibank, NA – affiliated with Citigroup  
The Bank of New York – affiliated with Bank of NY Mellon Corp.  
Aozora Bank – affiliated with Cerberus Capital Management  
BNP Paribas  
Mizuho Corporate Bank Ltd. – affiliated with Mizuho Financial Group  
Citibank N.A. Hong Kong Branch – affiliated with Citigroup  
Shinsei Bank Ltd. – affiliated with Ripplewood Holdings  
UFJ Bank Limited – affiliated with Mitsubishi UFJ Financial Group Inc.  
Sumitomo Mitsubishi Banking Corp. – affiliated with Sumitomo Mitsui Financial Group  
Svenska Handelsbanken  
Lloyds Bank, PLC  
KBC Bank – affiliated with KBC Groep NV  
Commonwealth Bank of Australia, Tokyo Branch – affiliated with Commonwealth Bank of Australia  
The Bank of Nova Scotia  
Chuo Mitsui Trust & Banking – affiliated with Mitsui Trust Holdings  
Bank of China, New York Branch – affiliated with Bank of China  
Microsoft Licensing, GP – affiliated with Microsoft Corp.  
ANZ Banking Group Limited – affiliated with Australia & New Zealand Banking Group Ltd.  
Standard Chartered Bank – affiliated with Standard Chartered PLC  
First Commercial Bank Co., Ltd., New York Agency  
Australia and New Zealand Banking Group Limited  
HSBC Bank – affiliated with HSBC Holdings PLC  
National Bank of Australia  
Banctec Ltd. – affiliated with Welsh Carson Anderson & Stowe  
The British Land Company PLC  
Standard & Poor's – affiliated with McGraw Hill Companies  
CB Richard Ellis Client Account RE Gloa – affiliated with CB Richard Ellis Group  
Sidley Austin Brown & Wood  
Reuters America Inc. – affiliated with Woodridge Co. Ltd.

IBM Corporation  
Network Appliance, Inc.  
Clifford Chance  
Ernst & Young  
Hewlett-Packard AP (HONG KONG) LIMITED – affiliated with Hewlett Packard Co.  
CDW Direct LLC – affiliated with Madison Dearborn  
Linklaters  
Allen & Overy  
Reuters Limited – affiliated with Woodbridge Co. Ltd.  
Paul Weiss  
Kim & Chang  
Standard and Poors Corp. – affiliated with McGraw Hill Companies  
Ernst and Young Private Limited – affiliated with Ernst & Young LLP  
FT Interactive Data – affiliated with Pearson PLC  
Thompson Financial – may be same as Thomson Financial – affiliated with Woodbridge Co. Ltd.  
Pricoa Relocation UK Limited – affiliated with Prudential Financial  
Davis, Polk and Wardwell  
Linklaters, S.L.  
Dell Marketing L.P. – affiliated with Dell Inc.  
ICAP Securities Limited – affiliated with ICAP Plc  
WIPRO Infotech Enterprise Solutions – affiliated with Wipro Ltd.

*Significant Landlords and Leases*

Deutsche Bank Securities, Inc. – affiliated with Deutsche Bank AG  
Deutsche Bank Securities, Inc. – affiliated with Deutsche Bank AG  
Clifford Chance US LLP  
The Irvine Company

*Secured Creditors*

JPMorgan Chase  
State Street  
MetLife  
SMBC  
Danske Bank

*Government and State Regulatory Agencies*

Securities and Exchange Commission – affiliated with USA  
Commodity Futures Trading Commission (LBI, NB LLC) – affiliated with USA  
Office of Thrift Supervision (LB Bank) – affiliated with USA

Federal Deposit Insurance Corporation (LB Bank, LB Commercial Bank) – affiliated with USA

Federal Energy Regulatory Commission (Lehman Brothers Commodity Services Inc.) – affiliated with USA

*Members of Ad Hoc or Unofficial Creditors' Committees*

Capital Research Management Co. – affiliated with Capital Group Companies

Oppenheimer Funds, Inc. – affiliated with Massachusetts Mutual Life Insurance Co.

Independence Holding Co. – affiliated with Geneve Holdings Corp.

The Vanguard Group

*Informal LBHI Bondholder Group – Not a client; members not listed*

*Significant Stockholders*

AXA and related parties

Clearbridge Advisors, LLC and related parties – affiliated with Legg Mason

FMR LLC and related parties

*Directors and Officers*

None

*Underwriting Investment Bankers*

Lehman Brothers

Hoare Govett, Ltd. – affiliated with ABN AMRO Holding

UBS Investment Bank – affiliated with UBS AG

Merrill Lynch – affiliated with Bank of America Corp.

ABN AMRO Rothschild – affiliated with ABN AMRO Holding

*Related Entities*

Area Assignor Corp. (dissolved) – affiliated with Lehman Brothers Holdings Inc.<sup>6</sup>

BK I Realty Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.

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<sup>6</sup> Paul Hastings represents, and has represented, Lehman Brothers Holdings Inc. in connection with the matters for which the Firm seeks to be retained.

BK II Properties Inc. – affiliated with Lehman Brothers Holdings Inc.  
BK III Properties Inc. – affiliated with Lehman Brothers Holdings Inc.  
Brookwood Energy & Properties Inc. – affiliated with Lehman Brothers Holdings Inc.  
Canope Credit Corp. – affiliated with Lehman Brothers Holdings Inc.  
DL Mortgage Corp. – affiliated with Lehman Brothers Holdings Inc.  
DRA Management, Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
Eagle Energy Partners I, L.P. – affiliated with Lehman Brothers Holdings Inc.  
East Dover Limited – affiliated with Lehman Brothers Holdings Inc.  
Edibrook Corp. – affiliated with Lehman Brothers Holdings Inc.  
EHP/GP Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
FRAH Special Services Inc. – affiliated with Lehman Brothers Holdings Inc.  
Fundo De Investimento Multimercado Credito Privado Navigator Investmento –  
affiliated with Lehman Brothers Holdings Inc.  
Growth Partners Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
Hydrocarbon Capital II LLC – affiliated with Lehman Brothers Holdings Inc.  
Jet Partners, LLC – affiliated with Lehman Brothers Holdings Inc.  
LB I Group Inc. – affiliated with Lehman Brothers Holdings Inc.  
LB Leasing Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Asset Backed Caps Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Venture Capital 2003 Partnership – affiliated with Lehman Brothers  
Holdings Inc.  
Lehman Brothers (Israel) Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers (Spain) S.A. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers 1999 Venture Managers' Partnership L.P. – affiliated with Lehman  
Brothers Holdings Inc.  
Lehman Brothers 1999 Venture GP Partnership L.P. – affiliated with Lehman Brothers  
Holdings Inc.  
Lehman Brothers AIM Holding II LLC – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Alternative Investment Management LLC – affiliated with Lehman  
Brothers Holdings Inc.  
Lehman Brothers Argentina S.A. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asset Management Asia, Inc. (dissolved) – affiliated with Lehman  
Brothers Holdings Inc.  
Lehman Brothers Asset Securitization LLC – affiliated with Lehman Brothers Holdings  
Inc.  
Lehman Brothers Capital Partners I, L.P. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Capital Partners II, L.P. – affiliated with Lehman Brothers Holdings  
Inc.  
Lehman Brothers Capital Partners IV, L.P. – affiliated with Lehman Brothers Holdings  
Inc.  
Lehman Brothers CDO 2003 L.P. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers CDO Associates (Cayman), Ltd. – affiliated with Lehman Brothers  
Holdings Inc.  
Lehman Brothers CDO Associates 2003 L.P. – affiliated with Lehman Brothers Holdings  
Inc.

Lehman Brothers CDO Associates 2004 L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers CDO Opportunity Partners 2004-2, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Commodity Service Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Communications Partnership – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers de Chile, S.A. (dissolved) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers de Venezuela C.A. (inactive) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Derivative Finance LLC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Derivative Products Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Diversified Private Equity Fund 2004, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Energy Canada, ULC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Europe Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers European Mezzanine 2002 Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers European Mezzanine 2002 L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers European Venture Capital Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers European Venture Capital L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Finance (Japan) Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Financial Products Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Fund of Funds Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Fund of Funds L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Global Asset Management K.K. (liquidated) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Healthcare Venture Capital Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Healthcare Venture Capital L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Holdings International Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers International Services, Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Investment Holding Company Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Investment Management Asia Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers LBO Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Associates III L.L.C. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Capital Partners 1998 (C) LP – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Finders 1999 (A) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Finders 1999 (B) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Finders 2000 (B) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1997 (A) L.P. (dissolved) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1997 (B) L.P. (dissolved) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1998 (A) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1998 (B) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1998 (C) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1999 (A) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1999 (B) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners 1999 (C) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Partners L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Venture Capital Partners 1997 – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Venture Capital Partners 1998 (A) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Venture Capital Partners 1998 (B) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Venture Capital Partners 1998 (C) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MBG Venture Capital Partners 1998 (D) L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MLP Associates, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers MLP Partners, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Diversified Arbitrage Fund, Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Diversified Arbitrage Master Fund Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Diversified Private Equity Fund 2004, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Investment Partnership L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Investment Partnership-Japan L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Long/Short Fund, Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Long/Short Master Fund Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Partners Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Partnership Account 2000/2001, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Partnership GP 2000/2001 L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Overseas Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Participation Fund Associates, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Partnership GP 2000/2001 L.P. (dissolved) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Secondary Fund of Funds Associates L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Secondary Fund of Funds L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Securities Taiwan Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers South Asia Limited (Inactive) – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Special Financing Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Sudamerica S.A. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Uruguay S.A. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers VC Partners L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Venture Associates Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Venture Bankers' Partnership L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Venture Capital Partners I, L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Venture GP Partnership L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Venture Partners L.P. – affiliated with Lehman Brothers Holdings Inc.

Lehman CMO Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Commercial Paper Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Insurance Company – affiliated with Lehman Brothers Holdings Inc.  
Lehman Pass-Through Securities Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Queens Limited Inc. (inactive) – affiliated with Lehman Brothers Holdings Inc.  
Lehman Risk Management, Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
Liberty Corner Inc. (sold) – affiliated with Lehman Brothers Holdings Inc.  
Liberty GP II Inc. (sold) – affiliated with Lehman Brothers Holdings Inc.  
Metro Realty Corporation (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
Morganberry Corporation – affiliated with Lehman Brothers Holdings Inc.  
Newark Properties One Inc. – affiliated with Lehman Brothers Holdings Inc.  
Northstar Equipment Leasing Income Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
NPC Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
PAC Aircraft Management Inc. – affiliated with Lehman Brothers Holdings Inc.  
QP80 Real Estate Services Inc. – affiliated with Lehman Brothers Holdings Inc.  
Rock Hill Real Estate, Inc. – affiliated with Lehman Brothers Holdings Inc.  
Scranzay, Inc. – affiliated with Lehman Brothers Holdings Inc.  
Senior Income Fund Inc. (dissolved) – affiliated with Lehman Brothers Holdings Inc.  
Shearson Lehman Brothers Capital Partners II, L.P. – affiliated with Lehman Brothers Holdings Inc.  
Shearson Lehman Hutton Capital Partners II – affiliated with Lehman Brothers Holdings Inc.  
Townsend Analytics, Ltd. – affiliated with Lehman Brothers Holdings Inc.

Former Lehman Brothers Holdings Inc. Entities

314 Commonwealth Ave. Inc. – affiliated with Lehman Brothers Holdings Inc.  
Alnwick Investments (UK) Limited – affiliated with Lehman Brothers Holdings Inc.  
Alnwick Investments (UK) Ltd. Kingdom – affiliated with Lehman Brothers Holdings Inc.  
Appalachian Asset Management Corp. – affiliated with Lehman Brothers Holdings Inc.  
Aurora Loan Services LLC – affiliated with Lehman Brothers Holdings Inc.  
Bamburgh Investments (UK) Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Banque Lehman Brothers S.A. – affiliated with Lehman Brothers Holdings Inc.  
Capstone Mortgage Services Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Eldon Street Holdings Limited – affiliated with Lehman Brothers Holdings Inc.  
Executive Monetary Management, Inc. – affiliated with Lehman Brothers Holdings Inc.  
Falcon LB Sarl – affiliated with Lehman Brothers Holdings Inc.  
Furno & Del Castano Capital Partners LLP – affiliated with Lehman Brothers Holdings Inc.  
L.B.C. YK – affiliated with Lehman Brothers Holdings Inc.  
LB Asset Management Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers U.K. Holdings Ltd. – affiliated with Lehman Brothers Holdings Inc.

LB Holdings Intermediate Ltd. – affiliated with Lehman Brothers Holdings Inc.  
LB Holdings Intermediate 1 Ltd. – affiliated with Lehman Brothers Holdings Inc.  
LB Holdings Intermediate 2 Ltd. LB I Group Inc. – affiliated with Lehman Brothers Holdings Inc.  
LB Investments (UK) Limited – affiliated with Lehman Brothers Holdings Inc.  
LB SPV SCA – affiliated with Lehman Brothers Holdings Inc.  
LB UK Financing Limited – affiliated with Lehman Brothers Holdings Inc.  
LB UK RE Holdings Ltd. – affiliated with Lehman Brothers Holdings Inc.  
LBCCA Holdings I Inc. – affiliated with Lehman Brothers Holdings Inc.  
LBCCA Holdings I LLC – affiliated with Lehman Brothers Holdings Inc.  
LBCCA Holdings II Inc. – affiliated with Lehman Brothers Holdings Inc.  
LBCCA Holdings II LLC – affiliated with Lehman Brothers Holdings Inc.  
LBO Investments Limited – affiliated with Lehman Brothers Holdings Inc.  
LBQ Funding (UK) – affiliated with Lehman Brothers Holdings Inc.  
Lehman ALI Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers (PTG) Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers AIM Holding III LLC – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asia Capital Company – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asia Capital Company Kong – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asia Holdings Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asia Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asia Pacific (Singapore) PTE. Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asset Management (Europe) Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asset Management France – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asset Management Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Asset Management, LLC – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Australia Granica PTY Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Australia Holdings PTY Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Australia Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Bancorp Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Bancorp UK Holdings Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Bank, FSB – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Bankhaus Aktiengesellschaft – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Canada Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Capital GmbH, Co. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Capital Private Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Co. Investment Associates LLC – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Commercial Bank – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Commercial Corporation – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Commercial Corporation Asia Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Commercial Mortgage K.K. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Commodity Services Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers do Brasil Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Equity Finance (Cayman) Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Europe Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Finance S.A – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Fixed Income Securities Private Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Futures Asia Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Futures Asset Management Corp. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Global Investments LLC – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Holdings Capital Trust IV – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Holdings Japan Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Holdings Plc – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Holdings Scottish LP – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Hy Opportunities Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Hy Opportunities Korea Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Insurance Agency L.L.C – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers International (Europe) – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Investment Korea Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Investments PTE Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Japan Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Luxembourg Investments Sarl – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Management LLC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Offshore Real Estate Associates, Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers OTC Derivatives Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers P.A. LLC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Pacific Holdings Pte. Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Equity Advisers – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Equity Advisers L.L.C – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Fund Advisers LP – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Fund Advisers LPD – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Fund Management LP – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Funds Investment Company GP, LLC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Private Funds Investment Company LP, LLC – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Securities Asia Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Securities N.V. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Securities Private Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Services India Private Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Singapore PTE Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers South East Asia Investments PTE Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Spain Holdings Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Special Financing Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Treasury Co. B.V. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Trust Company of Delaware – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Trust Company, National Association – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers U.K. Holdings (Delaware) Inc. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers U.K. Holdings Ltd. – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers UK Investments Limited – affiliated with Lehman Brothers Holdings Inc.

Lehman Brothers Verwaltungs-und Beteiligungsgesellschaft mbH – affiliated with Lehman Brothers Holdings Inc.

Lehman Capital Investments Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Commercial Mortgage Conduit Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Crossroads Corporate Investors II, LP – affiliated with Lehman Brothers Holdings Inc.  
Lehman Crossroads Corporate Investors, LP – affiliated with Lehman Brothers Holdings Inc.  
Lehman Crossroads Investment Advisers, LP – affiliated with Lehman Brothers Holdings Inc.  
Lehman Crossroads Investment Company, LP – affiliated with Lehman Brothers Holdings Inc.  
Lehman Re Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Risk Advisors Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Risk Services (Bermuda) Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Structured Assets Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lehman Syndicated Loan Funding Inc. – affiliated with Lehman Brothers Holdings Inc.  
LIBRO Holdings I Inc. – affiliated with Lehman Brothers Holdings Inc.  
Lincoln Capital Fixed Income Management Company, LLC  
MABLE Commercial Funding Limited – affiliated with Lehman Brothers Holdings Inc.  
MBAM Investor Limited – affiliated with Lehman Brothers Holdings Inc.  
Neuberger & Berman Agency, Inc. – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman Asset Management, LLC – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman Inc. – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman Investment Services, LLC – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman Management Inc. – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman Pty Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Neuberger Berman, LLC – affiliated with Lehman Brothers Holdings Inc.  
OCI Holdings Limited – affiliated with Lehman Brothers Holdings Inc.  
OOO Lehman Brothers – affiliated with Lehman Brothers Holdings Inc.  
Opal Finance Holdings Ireland Limited – affiliated with Lehman Brothers Holdings Inc.  
Preferred Group Limited – affiliated with Lehman Brothers Holdings Inc.  
Preferred Holdings Limited – affiliated with Lehman Brothers Holdings Inc.  
Preferred Mortgages Limited – affiliated with Lehman Brothers Holdings Inc.  
Principal Transactions Inc. – affiliated with Lehman Brothers Holdings Inc.  
Property Asset Management Inc. – affiliated with Lehman Brothers Holdings Inc.  
Real Estate Private Equity Inc. – affiliated with Lehman Brothers Holdings Inc.  
REPE LBREP II LLC – affiliated with Lehman Brothers Holdings Inc.  
REPE LBREP III LLC – affiliated with Lehman Brothers Holdings Inc.  
Resetfan Limited – affiliated with Lehman Brothers Holdings Inc.  
Resetfan Limited Capstone Mortgage Services Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Revival Holdings Limited  
Sage Partners, LLC – affiliated with Lehman Brothers Holdings Inc.

Southern Pacific Funding – affiliated with Lehman Brothers Holdings Inc.  
Southern Pacific Funding 5 Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Southern Pacific Mortgage Limited – affiliated with Lehman Brothers Holdings Inc.  
Lehman Brothers Europe Limited – affiliated with Lehman Brothers Holdings Inc.  
Storm Funding Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Storm Funding Ltd. Lehman (Cayman Islands) Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Thayer Properties (Jersey) Ltd. – affiliated with Lehman Brothers Holdings Inc.  
Thayer Properties Limited – affiliated with Lehman Brothers Holdings Inc.  
Wharf Reinsurance Inc. – affiliated with Lehman Brothers Holdings Inc.

Potential Parties in Interest

The Vanguard Group, Inc.  
Ameren et al.  
Harbinger Capital Partners – affiliated with Harbert Management Corp.  
Harbert  
UBS Financial Services – affiliated with UBS AG  
UBS International Inc. – affiliated with UBS AG  
UBS Financial Services of Puerto Rico – affiliated with UBS AG  
Harbinger Capital Partners Special Situations Fund LP – affiliated with Harbert Management Corp.  
Harbinger Capital Partners – affiliated with Harbert Management Corp.  
Thomson Reuters Plc & Thomson Reuters Corp. – affiliated with Woodbridge Co. Ltd.  
Citigroup, Inc.  
Citibank, NA – affiliated with Citigroup  
Morgan Stanley & Co.  
Wilmington Trust Company  
Credit Suisse  
Bank of New York Mellon  
Royal Bank of Scotland  
Federal Reserve Bank of New York – affiliated with Federal Reserve System  
Federal Express Corporation  
Accenture LLP – affiliated with Accenture Co. Ltd. and Accenture Japan Ltd.  
Lehman Brothers Private Equity Funds – affiliated with Lehman Brothers Holdings Inc.  
Interactive Data Corp. – affiliated with Pearson Plc  
Green Tree Servicing LLC – affiliated with Green Tree Financial Servicing Corp.  
Wells Fargo Bank, NA – affiliated with Wells Fargo & Co.  
Wells Fargo & Co.  
BP North America – affiliated with BP Plc  
BP Energy – affiliated with BP Plc  
BP Canada – affiliated with BP Plc  
IGI Resources – affiliated with BP Plc  
Fred Hutchinson Cancer Research Center  
Fannie Mae

Factiva, Inc. – affiliated with News Corp.  
Canadian Imperial Bank  
CIBC World Market. – affiliated with Canadian Imperial Bank  
CIBC World Markets Inc. – affiliated with Canadian Imperial Bank  
Sumitomo Mitsui Banking Corp. – affiliated with Sumitomo Mitsui Financial Group  
SMBC Capital Markets – affiliated with Sumitomo Mitsui Financial Group  
Sumitomo Mitsui Brussels Branch – affiliated with Sumitomo Mitsui Financial Group  
Societe Generale  
Washington Mutual Bank – affiliated with JPMorgan & Chase Co.  
Washington Mutual, Inc. – affiliated with JPMorgan & Chase Co.  
National Bank of Canada  
Occidental Energy Marketing, Inc. – affiliated with Occidental Petroleum Corp.  
Toronto-Dominion Bank – affiliated with TD Bank Financial Group  
Dresdner Kleinwort Group Holdings LLC – affiliated with Allianz SE  
Normandy Hill Capital, LP  
Office of Thrift Supervision – affiliated with USA  
Office of Thrift Supervision, Northeast Region – affiliated with USA  
General Electric Capital Corp – affiliated with General Electric Co. Inc.  
ING bank, FSB – affiliated with ING Groep NV  
Microsoft Corporation  
Microsoft Licensing – affiliated with Microsoft Corp.  
Dresdner Kleinwort Group Goldings LLC – affiliated with Allianz SE  
Svenska Handelsbanken AB  
Mizuho Corporate Bank LTD – affiliated with Mizuho Financial Group  
Chevron Natural Gas – affiliated with Chevron Corporation  
Bank of China  
AIG Global Investment Corporation – affiliated with AIG  
Green Tree Servicing Inc. – affiliated with Green Tree Financial Servicing Corp.  
Wilmington Trust Company  
Wilmington Trust FSB – affiliated with Wilmington Trust Company  
Mack-Cali Realty LP  
J P Morgan Chase Bank, N.A. – affiliated with JPMorgan & Chase Co.  
Mizuho Corporate Bank – affiliated with Mizuho Financial Group  
Verizon Communications Inc.  
Deustche Bank Securities Inc. – affiliated with Deutsche Bank AG  
Brookfield Properties One WFC Co. LLC – affiliated with Brookfield Asset Management  
Inc.  
Morgan Stanley & Co. Incorporated  
Credit Suisse  
US Bank Natl Assoc. – affiliated with US Bancorp  
Bank Of Montreal – affiliated with BMO Financial Group  
Natl Australia Bank Limited  
Barclays Capital, Inc. – affiliated with Barclays PLC UK  
Contrarian Capital Management, LLC  
Federal Home Loan Mortgage Corp

Allianz Global Investors AG – affiliated with Allianz SE  
M. Arthur Gensler Jr and Assoc, Inc.  
Gensler Architecture, Design And Planning, P.C. – affiliated with M Arthur Gensler & Associates  
Chuo Mitsui Trust And Banking Co. – affiliated with Mitsui Trust Holdings Inc  
Brookfield Properties One WFC Co. LLC – affiliated with Brookfield Asset Management Inc.  
European Bank For Reconstruction  
GE Capital Information Technology – affiliated with General Electric Co Inc.  
The Bank Of Tokyo-Mitsubishi UFJ, Ltd – affiliated with Mitsubishi UFJ Financial Group  
The Chuo Mitsui Trust And Banking Co., Ltd – affiliated with Mitsui Trust Holdings Inc  
Tishman Speyer Properties, L.P.  
Shinsei Bank Limited –75092, subsidiary of Ripplewood Holdings  
GE Capital Information Technology Solutions, Inc. D/B/A Ikon Financial Services - affiliated with General Electric Co Inc.  
Office Of The United States Attorney – affiliated with USA  
Russell Investment Group, Inc. – affiliated with Northwestern Mutual Life Insurance Co.  
Telecom Italia Capital S.A. – affiliated with Telecom Italia SPA  
Oracle Credit Corporation – affiliated with Oracle Corporation  
Eaton Corporation  
Union Bank Of California, N.A. – affiliated with Mitsubishi UFJ Financial Group  
Business Objects Americas  
Frictionless Commerce, Inc. – affiliated with SAP AG  
Tangoe, Inc.  
Open Solutions Inc. – affiliated with Carlyle Holding Corp.  
CB Richard Ellis, Inc.  
Sprint Nextel Corp  
AEW Capital Management, LP – affiliated with Natixis  
Lyon Capital Ventures – affiliated with William Lyon Company  
PJM Interconnection, L.L.C.  
Newedge USA, LLC – affiliated with Societe Generale SA  
Pacific Gas & Electric Company

Affiliations of Outside Directors

Michael L. Ainslie

- director - Lehman Brothers Bank, FSB - affiliated with Lehman Brothers Holdings Inc.

John F. Akers

- director - W.R. Grace & Co.

Marsha Johnson Evans

- director - Huntsman Corporation

Roland A. Hernandez

- director of MGM Mirage – affiliated with Tracinda Corp
- director - Sony Corporation
- director - Vail Resorts, Inc.
- President's Council on International Activities – Yale University – affiliated with Yale University

Henry Kaufman

- member - Board of Trustees of New York University – affiliated with New York University
- member (and the chairman emeritus) - Board of Overseers of the Stern School of Business of New York University – affiliated with New York University
- member of the International Advisory Committee of the Federal Reserve Bank of New York – affiliated with Federal Reserve System

Sir Christopher Gent

- director - Ferrari SpA – affiliated with Guovanni Agnelli EC Sapa

*Professionals Employed by the Company*

Heller Ehrman LLP

McKenna Long & Aldridge LLP

Hahn Loeser & Parks LLP

Thacher Proffitt & Wood LLP

Ernst & Young

PricewaterhouseCoopers

DLA Piper

White & Case

Sidley Austin LLP

Andrews & Kurth LLP

Herrick & Feinstein MMOR Consulting – affiliated with Herrick & Feinstein LLP

Latham & Watkins, LLP

Schulte, Roth, & Zabel LLP

Hunton & Williams LLP

Miller Canfield Paddock Stone

Sonnenschein Nath & Rosenthal

Willkie Farr & Gallagher LLP

Menter, Rudin & Trivelpiece, P.C.

Mercer Marsh & McLennan Companies – affiliated with Marsh & McLennan Companies

Allen & Overy LLP

Dorsey & Whitney LLP

Paul, Weiss, Rifkind, Wharton & Garrison LLP

Squire, Sanders & Dempsey L.L.P.

Hahn Loeser & Parks LLP

Cadwalader, Wickersham & Taft LLP

Skadden, Arps, Slate, Meagher & Flom LLP  
Prickett Jones & Elliott, P.A.  
Mitsui Company & Mitsui & Co.  
Herbert Smith Ltd.  
Oh-Ebashi LPC & Partners  
Morrison & Foerster LLP  
Freshfields Bruckhaus Deringer  
Baker & McKenzie LLP  
Jones Day  
Latham & Watkins LLP  
Davies Ward Phillips & Vineberg  
Gibson, Dunn & Crutcher LLP  
Paul, Hastings, Janofsky & Walker LLP  
Morrison & Forster  
Stroock, Stroock & Lavan

*Litigation Claimants*

First Alliance Mortgage Company Class Action  
In re Mirant Corporation Securities Litigation (class action) – Mirant Corporation is  
client

*100 Largest Holders of Trade Debt*

Microsoft Corporation  
IBM Corporation  
Network Appliance Inc.  
FTIInteractive Data – affiliated with Pearson Plc  
CDW Direct LLC – affiliated with Madison Dearborn Partners  
Dell Marketing L.P. – affiliated with Dell Inc.  
AC Nielsen Company – affiliated with Carlyle Holding Corp.  
Thomson Financial – affiliated with Woodbridge Co. Ltd.  
Ernst & Young LLP  
Northrop Grumman  
Hewlett Packard Company  
Storage Technology Corp – affiliated with Sun Microsystems  
RR Donnelley Receivables Inc. – affiliated with RR Donnelly & Sons Co  
Cushman & Wakefield Inc. – affiliated with Giovanni Agnelli EC Sapa  
Computer Associates International Inc. – affiliated with CA Inc.  
CHD Meridian Healthcare – affiliated with Walgreen Co.  
Allen & Overy  
Wipro Technologies – affiliated with Wipro Ltd.  
Interactive Data Corp. – affiliated with Pearson PLC  
Ikon Office Solutions Inc.  
Rockefeller Center North, Inc. – affiliated with Mitsubishi Estate Co. Ltd.  
Trimont Real Estate Advisors Inc.

CDW Direct LLC – affiliated with Madison Dearborn Partners  
Kepner Tregoe Inc.  
Cyveillance  
Network Appliance Inc.  
IBM Corporation  
Quest Software Inc.  
Restaurant Associates – affiliated with Compass Group Plc  
Mellon Analytical Solutions – affiliated with Bank of NY Mellon Corp.  
Aperture Technologies – affiliated with Emerson Electric Co.  
Lexis-Nexis – affiliated with Reed Elsevier Group plc  
Lexis Nexis – affiliated with Reed Elsevier Group plc  
Transaction Network Services – affiliated with GTCR Golden Rauner LLC  
Hewlett Packard Company  
ILOG Inc. – affiliated with Ilog SA  
The Bank Of New York – affiliated with Bank of NY Mellon Corp  
KPMG, LLP – affiliated with KPMG International  
Computer Associates International Inc. – affiliated with CA Inc.

Professionals Retained by Significant Creditor Groups

Milbank, Tweed, Hadley & McCloy LLP  
Munsch Hardt Kopf & Harr, P.C.  
Akin Gump Strauss Hauer & Feld LLP

Utilities

Con Edison – affiliated with Consolidated Edison Inc.  
The Hess Corporation  
ComEd – affiliated with Exelon Corp.  
Sempra Energy Solutions – affiliated with Sempra Energy  
AT&T  
Dominion – Multiple listings found, please provide full name  
Interstate Gas – Multiple listings found, please provide full name  
Illuminating – Multiple listings found, please provide full name  
Time Warner

Committee Members

Wilmington Trust Company  
Mizuho Corporate Bank, Ltd. – affiliated with Mizuho Financial Group  
RR Donnelley & Sons  
The Bank of NY Mellon  
The Royal Bank of Scotland, PLC  
Shinsei Bank, Limited – affiliated with Ripplewood Holdings  
Metlife

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
In re : : Chapter 11 Case No.  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
-----x

## RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN  
BROTHERS HOLDINGS INC. ("LBHI") OR ANY OF ITS DEBTOR AFFILIATES  
(collectively, the "Debtors")

DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.  
RETURN IT FOR FILING BY THE DEBTORS, TO:

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Paul, Hastings, Janofsky & Walker LLP  
Park Avenue Tower  
75 East 55th Street, 1st Floor  
New York, NY 10022

2. Date of retention: Petition Date, although the Firm has represented Lehman Brothers Holdings Inc. and one or more of its affiliates for several years.

3. Type of services provided (accounting, legal, etc.): Legal Services

4. Brief description of services to be provided:

The Debtors have asked that the Firm provide certain real estate services to the Debtors. More specifically, the Debtors have requested that the Firm represent the Debtors and their direct and indirect subsidiaries in (a) asset management and liquidation activities with respect to loans and other assets, and (b) the negotiation of commercial real estate lease transactions, such as subleases, assignments, and amendments to existing leases. The Firm has consented to provide such services and other legal services as the Debtors may request.

5. Arrangements for compensation (hourly, contingent, etc.): Hourly

(a) Average hourly rate (if applicable):

The Firm's current billing rates for attorneys in the United States range from \$150 to \$950 per hour. The Firm's hourly rates are subject to periodic adjustments to reflect economic and other conditions.

(b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

The Firm billed an average of \$140,000 per month during the twelve month period preceding the Debtors' bankruptcy filing.

6. Prepetition claims against the Debtors held by the Firm:

To the best of my knowledge, information, and belief formed after reasonable inquiry, the Firm holds a prepetition claim against the Debtors as follows:

Amount of claim: \$840,000 approximately<sup>7</sup>

Date claim arose: During the Firm's prepetition representation of the Debtors

Source of Claim: Nonpayment of legal bills

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

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<sup>7</sup> As of the Petition Date, Lehman Brothers Inc. owed the Firm approximately \$644,000 for legal services rendered and expenses incurred.

To the best of my knowledge, information, and belief formed after reasonable inquiry, the following members, associates, and professional employees of the Firm individually hold prepetition claims against the Debtors:<sup>8</sup>

None

8. Stock of the Debtors currently held by the firm:

To the best of my knowledge, information, and belief formed after reasonable inquiry, the Firm holds no stock of the Debtors.

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the Firm:

To the best of my knowledge, information, and belief formed after reasonable inquiry, the following members, associates, and professional employees of the Firm individually hold stock of the Debtors:<sup>9</sup>

Paul Grossman, 4400 shares of LBHI stock

Ned N. Isokawa, 2000 shares of LBHI common stock

J. Wes Skinner, 172 shares of LBHI stock

Seth Zachary, 500 shares of LBHI preferred stock

10. Disclose the nature and provide a brief description of any interest held or represented by the Firm adverse to the Debtors or to their estates with respect to the matters on which the Firm is to be employed.

To the best of my knowledge, information, and belief formed after reasonable inquiry, the Firm does not hold or represent any interest adverse to the Debtors or their estates with respect to the matters on which the Firm seeks to be employed.

11. Name of individual completing this form: Kenneth J. Friedman

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<sup>8</sup> Based on responses to a Firm-wide email containing questions 7 and 9 above.

<sup>9</sup> Based on responses to a Firm-wide email containing questions 7 and 9 above.